

Exhibit A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Three Arrows Capital, Ltd.,¹

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 22-10920 ()

**[PROPOSED] ORDER GRANTING
AUTHORIZATION TO FILE UNREDACTED PETITION UNDER SEAL**

Upon the Motion (the “Motion”)² of the Foreign Representatives for entry of an order (this “Order”) pursuant to sections 105(a) and 107(b) of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Bankruptcy Rules 9013-1(a) and 9018-1 (i) authorizing the Foreign Representatives to file under seal the Litigation Schedule attached to the Petition, and (ii) directing that such information remain confidential and under seal and not be made available to anyone without the prior written consent of the Foreign Representatives, all as more fully set forth in the Motion; and this Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and it appearing that venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and this Court having reviewed the Motion; and it appearing that the relief requested in the Motion is in the best interests of the Debtor and its estate and creditors; and this Court having determined that the legal

¹ The last four digits of the Debtor’s British Virgin Islands company registration number are 0531. The location of the Debtor’s registered office is ABM Chambers, P.O. Box 2283, Road Town, Tortola, VG1110, British Virgin Islands.

² Capitalized terms used herein but not defined shall have the meanings ascribed to them in the Motion.

and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY FOUND AND DETERMINED THAT:

1. The Motion is granted as set forth herein.
2. The Foreign Representatives are authorized to file the Petition on the public docket of this case with the Litigation Schedule redacting the Confidential Information.
3. The unredacted Petition containing Confidential Information is confidential and shall remain under seal, and shall not be made available to anyone other than this Court, the Clerk of the Court, and the U.S. Trustee. The U.S. Trustee shall keep the Confidential Information on a strictly confidential basis. Any party who receives the Confidential Information in accordance with this Order shall not disclose or otherwise disseminate such information to any other person or entity without the prior consent of the Foreign Representatives.
4. Upon closure of the Chapter 15 Case, the Clerk's Office is directed to release any hard copies or electronic storage device of the Confidential Information to the Foreign Representatives for disposal.
5. Notice of the Motion is adequate under Bankruptcy Rule 6004(a).
6. Notwithstanding the provisions of Bankruptcy Rule 6004(h), this Order shall be immediately effective and enforceable upon its entry.
7. The Foreign Representatives are authorized to take all actions necessary or appropriate to carry out the relief granted in this Order.

8. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____, 2022
New York, New York

THE HONORABLE
UNITED STATES BANKRUPTCY JUDGE